

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., HASSAN
AHMED, and STEPHEN NILL,

Defendants.

Case No.: C-04-10294 -DPW

Class Action

This Document Relates To:

ALL RELATED ACTIONS.

**BPI GLOBAL ASSET MANAGEMENT LLP'S
MOTION FOR APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

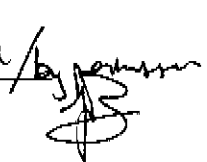
Proposed Lead Plaintiff BPI Global Asset Management LLP, by its counsel, hereby respectfully moves this Court to be appointed Lead Plaintiff in the consolidated securities class action and approve its selection and retention of Gold Bennett Cera & Sidener LLP as Lead Counsel.

In support of this Motion, BPI Global Asset Management LLP submits herewith a Memorandum of Law, the Declaration of Joseph M. Barton, and a Proposed Order.

DATED: April 9, 2004

Respectfully submitted,

GRAHAM & ALBANO, P.C.

By: Patricia Szumowski 

Patricia Szumowski, BBO #653839
100 Russell Street
P.O. Box 377
Hadley, Massachusetts 01035
Telephone: (413) 586-5055
Facsimile: (413) 532-3387

GOLD BENNETT CERA & SIDENER LLP

Steven O. Sidener
Joseph M. Barton
595 Market Street, Suite 2300
San Francisco, CA 94105
Tel: (415) 777-2230
Fax: (415) 777-5189

Attorneys for Proposed Lead Plaintiff
BPI Global Asset Management LLP

CERTIFICATE OF SERVICE

I HERBY CERTIFY THAT A TRUE COPY OF THE ABOVE
DOCUMENT WAS SERVED UPON THE ATTORNEYS OF
RECORD FOR EACH OTHER PARTY
BY MAIL (BY HAND) ON 4/9/2004

Patricia Szumowski 